
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

United Cable Services LLC

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been assigned)

-against-

Foss Energy Services, Inc

Clarity Telecom, LLC d/b/a Bluepeak

COMPLAINT

Do you want a jury trial?

☐ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☐ **Federal Question**
- ☒ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?
Prompt Payment Act

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, United Cable Services LLC, is a citizen of the State of
(Plaintiff's name)

New Jersey

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

_____.

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, Foss Energy Services, Inc, is incorporated under the laws of
the State of Texas

and has its principal place of business in the State of Texas

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

First Name	Middle Initial	Last Name
Street Address		
	NJ	07751
County, City	State	Zip Code
6467427653		
Telephone Number	Email Address (if available)	

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, Clarity Telecom, LLC d/b/a Bluepeak, is incorporated under the laws of
the State of South Dakota

and has its principal place of business in the State of Wyoming

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

First Name	Middle Initial	Last Name
Igor		Anokhin
165 Amboy RD STE 400		
Street Address		
Morganville	NJ	07751
County, City	State	Zip Code
6467427653	igor@unitedcable.net	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	<div style="display: flex; justify-content: space-between;"> Nathan Downing </div>
	<div style="display: flex; justify-content: space-between;"> First Name Last Name </div>
	<div style="display: flex; justify-content: space-between;"> CEO </div>
	<div style="display: flex; justify-content: space-between;"> Current Job Title (or other identifying information) </div>
	<div style="display: flex; justify-content: space-between;"> 2305 Ridge Road St.202 </div>
	<div style="display: flex; justify-content: space-between;"> Current Work Address (or other address where defendant may be served) </div>
	<div style="display: flex; justify-content: space-between;"> Rockwall TX 75087 </div>
	<div style="display: flex; justify-content: space-between;"> County, City State Zip Code </div>
Defendant 2:	<div style="display: flex; justify-content: space-between;"> Clarity Telecom LLC d/b/a Bluepeak </div>
	<div style="display: flex; justify-content: space-between;"> First Name Last Name </div>
	<div style="display: flex; justify-content: space-between;"> Compliance Officer </div>
	<div style="display: flex; justify-content: space-between;"> Current Job Title (or other identifying information) </div>
	<div style="display: flex; justify-content: space-between;"> 5100 S. Broadband Lane </div>
	<div style="display: flex; justify-content: space-between;"> Current Work Address (or other address where defendant may be served) </div>
	<div style="display: flex; justify-content: space-between;"> Sioux Falls SD 57108 </div>
	<div style="display: flex; justify-content: space-between;"> County, City State Zip Code </div>
Defendant 3:	<div style="display: flex; justify-content: space-between;"> </div>
	<div style="display: flex; justify-content: space-between;"> First Name Last Name </div>
	<div style="display: flex; justify-content: space-between;"> Current Job Title (or other identifying information) </div>
	<div style="display: flex; justify-content: space-between;"> Current Work Address (or other address where defendant may be served) </div>
	<div style="display: flex; justify-content: space-between;"> County, City State Zip Code </div>

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: Sheridan, Casper Wyoming

Date(s) of occurrence: _____

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Clarity Telecom LLC is a telecommunications and internet provider that hired Foss INC to perform telecommunication construction services. On or about July 21, 2023 Foss INC and United Cable Services executed a "Master Construction

Subcontract Agreement" (the "Contract"), wherein Foss hired United cable Services to perform utility construction services as needed by Foss Inc. The Plaintiffs timely performed under the Contract all their obligations as assigned by Foss, including, but not limited to, connecting cables and wires from pole to pole, running

them underground, and splicing them pursuant to blueprints provided by Foss. The

~~Plaintiffs submitted twenty separate invoices to Foss itemizing the services~~

performed and the amounts due. Combined, the amount owed on these invoices

exceeds one hundred ninety thousand. Foss has failed to pay these invoices despite

repeated demands from the Plaintiffs. As the owner of properties that have been

improved by the Plaintiffs' services, Clarity Telecom have been unjustly enriched by the Plaintiffs' performance of their services.

Clarity Telecom have not compensated the Plaintiffs for this enrichment.

The Plaintiffs incorporate by reference each of their allegations in the preceding paragraphs of this Complaint.

The Contract is a valid and binding contract between United Cable Services and Foss

Foss has defaulted under the Contract by failing to timely make payments as they came due. These damages exceed one hundred ninety thousand

The Plaintiffs have suffered damages due to Excell's defaults under the Contract.

The Plaintiffs have suffered damages due to Foss's defaults under the Contract.

~~WHEREFORE, United Cable Services LLC demand judgment against~~
 Foss, Inc. for breach of contract in an amount not less than one hundred ninety
 thousand, plus interest, attorneys' fees, court costs, and other such relief as may be just.
 The Defendants knowingly accepted and received the benefit of the Plaintiffs' utility
 construction services. The Defendants unfairly benefitted from the services provided by
 the Plaintiffs and have not compensated the Plaintiffs for the services they benefitted
 from. The Defendants have been unjustly enriched by the benefit of the Plaintiffs'
 services
 that they have received without compensation. In equity and good conscience, the
 Defendants should be required to compensate the Plaintiffs for the benefit they have
 received from the Plaintiffs' services. In performing their services, the Plaintiffs had a
 reasonable expectation of compensation for their services, and the Defendants impliedly
 promised to pay the Plaintiffs for those services by accepting them. The Defendants'
 failure to compensate the Plaintiffs for their services has damaged the Plaintiffs

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical
 treatment, if any, you required and received.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

WHEREFORE, United Cable Services LLC demand judgment against
~~Foss, Inc. and Clarity Telecom LLC~~
 jointly and severally, for compensation for the value of their services under quantum
 meruit,
 but at any rate in an amount not less than one hundred ninety thousand, plus attorneys'
 fees, court costs, and other such relief as may be just.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

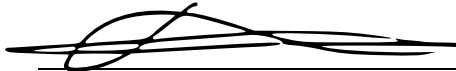
I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

04/15/2025

Dated

Igor



Plaintiff's Signature

Anokhin

First Name

Middle Initial

Last Name

165 Amboy RD STE 400

Street Address

Morganville

07751

County, City

State

Zip Code

6467427653

igor@unitedcable.net

Telephone Number

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.